

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

v.

CASE # 1:19-cr-10063-DJC

RANDALL CRATER,

Defendant.

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**MOTION TO CONTINUE FINAL STATUS CONFERENCE (opposed)**

Comes the above Defendant, Randall Crater, by and through undersigned counsel, and pursuant to Federal Rules of Criminal Procedure 45(b) and Local Rule 7.1, 7.1(a)(2), to grant a continuance of the final status conference to enable counsel to further review discovery, file pre-trial motions until January 6, 2020.

**REASONS FOR REQUESTED CONTINUANCE**

Presently next court date is December 16, 2019. The discovery thus far received in this case is voluminous, to include several hundred thousand documents. In reviewing discovery, counsel encountered numerous documents of a highly technical nature involving the existence and functionality of “so called” web wallets. Counsel had to locate and seek a review of these documents which has taken unexpected time.

Counsel would ask for additional time in that THE DEFENSE intends to file several dispositive motions for the Court’s consideration and ruling and all these motions are in preliminary draft form.

Further, there have been unanticipated delays due to the fact the Defendant resides in Florida, Crater’s counsel lives in South Carolina and this case is charging fraud (My Big Coin)

which was incorporated in Nevada. The nexus to Massachusetts is solely because that's where at least one of the victims resides. As such, in order to properly and vigorously defend this case, counsel Chandler needs to meet at least several times face-to-face with defendant Crater and to review the referenced discovery and the proposed motions to be filed. Undersigned counsel has other pressing cases so time and coordination of such meetings including travel has presented its own set of difficulties.

Undersigned counsel now requests a continuance such that contemplates the end of the year holiday time frame. Granting this extension would impact less than ten (10) business days and would involve no prejudice to the Government nor would it cause an unreasonable delay in this case, in the opinion of defense attorney Chandler.

WHEREFORE, in consideration of the forgoing, the defense moves this Honorable Court for a continuance until January 6, 2020 and to reschedule the final status conference until this date. The Defendant hereby waives and Speedy Trial Act requirements as set forth in 18 U.S.C. §§ 3161–3174 from 12-16-19 to 1-6-20 or such other date that meets the courts' schedule in order to facilitate this requested extension of time.

Respectfully submitted,

/s/ Ray Chandler

SC Bar #1183

U.S. District #93

Attorney for Defendant Randall Crater

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Opposed: AUSA of record

**CERTIFICATE OF SERVICE**

I, Ray Chandler, Esq, attorney for Defendant Randall Crater, do hereby certify that a true and correct copy of the foregoing was duly served on the United States by filing same on the Court's CM/ECF filing system which electronically serves all attorneys and parties of record, this 12th day of December, 2019.

/s/ Ray Chandler, Esq.